

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
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2003 DEC 16 P 4: 26

DEBRA S. FOLKERTS,  
On Behalf Of Herself and All Others  
Similarly Situated,

Plaintiff,

v.

ALKERMES, INC., RICHARD F. POPS,  
ROBERT A. BREYER, DAVID A. BROECKER,  
MICHAEL LANDINE, JAMES M. FRATES  
and JAMES L. WRIGHT,

Defendants.

U.S. DISTRICT COURT  
DISTRICT OF MASS.

CIVIL ACTION NO.  
03-12386 RCL

**JOINT MOTION AND [PROPOSED] ORDER  
TO EXTEND TIME TO RESPOND TO THE COMPLAINT**

The parties hereto, by and through their counsel, hereby agree to extend the time within which defendants Alkermes, Inc., Richard F. Pops, Robert A. Breyer, David A. Broecker, Michael Landine, James M. Frates and James L. Wright (collectively the "Defendants") must answer, move or otherwise respond to the complaint in this action. Plaintiff has represented that she will file an amended complaint in this action. Thus, the parties respectfully request that the following briefing schedule be ordered in this case:

- The consolidated amended complaint shall be due sixty (60) days after the Court's selection of a lead plaintiff pursuant to § 78u-4(a)(3) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78a et seq.), as amended by the Private Securities Litigation Reform Act of 1995 (the "Reform Act").
- Defendants shall have sixty (60) days following the filing of the consolidated amended complaint to answer or otherwise respond to the complaint.

- If the Defendants move to dismiss the complaint or any amended complaint, plaintiff shall have sixty (60) days from the receipt of Defendants' motion to file her opposition thereto.
- Following the receipt of plaintiffs' opposition, Defendants shall have forty-five (45) days to file a reply brief in support of their motion to dismiss.

Dated: December 16, 2003

DEBRA S. FOLKERTS  
On Behalf of Herself and All  
Others Similarly Situated

ALKERMES, INC., RICHARD F. POPS,  
ROBERT A. BREYER, DAVID A.  
BROECKER, MICHAEL LANDINE, JAMES  
M. FRATES and JAMES L. WRIGHT

By her attorneys,

David Pastor  
David Pastor (BBO #391000)  
GILMAN AND PASTOR, LLP  
Stonehill Corporate Center  
999 Broadway, Suite 500  
Saugus, MA 01906  
(781) 231-7850

Lionel Z. Glancy  
Michael Goldberg  
GLANCY & BINKOW LLP  
1801 Avenue of the Stars  
Suite 311  
Los Angeles, CA 90067  
(310) 201-9150

Jeffrey M. Norton  
WECHSLER HARWOOD LP  
488 Madison Avenue, 8<sup>th</sup> Floor  
New York, NY 10022  
(212) 935-7400

Charles J. Piven (Of Counsel)  
LAW OFFICES OF CHARLES J. PIVEN  
The World Trade Center  
401 East Pratt Street, Suite 2525  
Baltimore, MD 21202  
(410) 332-0030

By their attorneys,

Alexis Shapiro  
Brian E. Pastuszeriski (BBO# 390130)  
Steven D. Whetstone (BBO#562196)  
Alexis L. Shapiro (BBO# 633562)  
TESTA, HURWITZ & THIBEAULT, LLP  
125 High Street  
High Street Tower  
Boston, MA 02110  
(617) 248-7000

IT IS SO ORDERED:

\_\_\_\_\_  
United States District Judge

Dated: \_\_\_\_\_

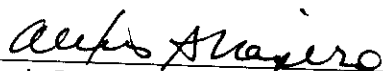
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**CERTIFICATE OF SERVICE** 2003 DEC 16 P 4: 26

U.S. DISTRICT COURT  
DISTRICT OF MASS.

I, Alexis L. Shapiro, do hereby certify that on the sixteenth day of December, 2003, I caused a true copy of the Joint Motion And [Proposed] Order To Extend Time to Respond To The Complaint to be served on counsel for Plaintiff Debra S. Folkerts, David Pastor of Gilman and Pastor, LLP, Stonehill Corporate Center, 999 Broadway, Suite 500, Saugas, MA 01906 and Lionel Z. Glancy of Glancy & Binkow LLP, 1801 Avenue of the Stars, Suite 311, Los Angeles, CA 90067, Jeffrey M. Norton of Wechsler Harwood LP, 488 Madison Avenue, 8<sup>th</sup> Floor, New York, NY 10022, and Charles J. Piven of Law Offices of Charles J. Piven, The World Trade Center, 401 East Pratt Street, Suite 2525, Baltimore, MD 21202 by First-class mail.

Dated: December 16<sup>th</sup>, 2003

  
\_\_\_\_\_  
Alexis L. Shapiro  
Testa, Hurwitz & Thibault, LLP  
125 High Street  
Boston, MA 02110